

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JESSICA DENSON, Individually and on
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

DONALD J. TRUMP FOR PRESIDENT, INC.,

Defendant.

No. 20 Civ. 4737 (PGG)

ORAL ARGUMENT REQUESTED

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying memorandum of law dated July 30, 2020, statement of undisputed facts, declaration of Plaintiff Jessica Denson and exhibits thereto, and declaration of David K. Bowles, Esq. and exhibits thereto, Plaintiff Jessica Denson, on behalf of herself and all others similarly situated, hereby moves this Court, before the Honorable Paul G. Gardephe, United States District Judge, in the United States Courthouse, 40 Foley Square, New York, New York, for judgment pursuant to Federal Rule of Civil Procedure 56 declaring that the Campaign's Form NDA signed by Plaintiff and any similar contracts the Campaign required any worker to sign are invalid and unenforceable, and permanently enjoining the Campaign and any party entitled to enforce the Form NDA from enforcing, attempting to enforce, and/or threatening to enforce the Form NDA.

Dated: July 30, 2020

Respectfully Submitted,

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*Motion for admission *pro hac vice*
forthcoming